

Facility Fact Sheet

Santolubes Manufacturing, LLC dba Blackman Uhler Specialties

Spartanburg, Spartanburg County, South Carolina

Draft Modified Hazardous Waste Permit Facility ID# SCD 003 349 065

The South Carolina Department of Health and Environmental-Control (DHEC) has written a Draft Postclosure Hazardous Waste Permit for the Santolubes Manufacturing, LLC facility (Santolubes), in Spartanburg, South Carolina.

The draft permit has been written to comply with the South Carolina Hazardous Waste Management Regulations and the Resource Conservation and Recovery Act (RCRA), as amended by the Hazardous and Solid Waste Amendments.

This fact sheet explains DHEC's hazardous waste permitting process and the conditions of the draft permit.

DHEC will hold an informal public meeting to discuss the draft permit with interested citizens. The public meeting is scheduled for August 31, 2011, at 6:30 p.m. For more information, please refer to Section VI.

I. Hazardous Waste Permitting Process

DHEC regulates hazardous waste activities at permitted facilities in South Carolina.

The permitting process gives DHEC and other government agencies the opportunity to evaluate the ability of a facility to comply with state and federal regulations.

After the Statement of Basis is received and determined to be complete, DHEC writes a draft permit containing all conditions that the facility must meet.

Interested citizens are given forty-five (45) days to review and comment on the facility's Statement of Basis and the draft permit before DHEC makes a final decision on the draft permit.

DHEC encourages all interested persons to participate in our permitting process.

II. Facility Description

The Santolubes facility (formerly Blackman Uhler Chemical Company) is a manufacturer of a variety of specialty chemicals for agriculture, paper manufacturing, and the oil industry. The

facility is located approximately two miles southeast of the City of Spartanburg at 2155 West Croft Circle. The facility first began operation in 1954 as the Blackman Uhler Chemical Company (BUCC). On October 2, 2009 Santolubes Holdings, LLC purchased the manufacturing operations of the Blackman Uhler Chemical Company and began operation of the facility as Santolubes Manufacturing, LLC doing business (dba) Blackman Uhler Specialties. The operating portion of the facility consists of approximately 41 acres of land and includes production facilities, warehouses and laboratories, waste management areas and administrative buildings.

BUCC operated a 750,000 gallon surface impoundment from approximately 1970 to 1987. Prior to 1982 the surface impoundment managed methanol solutions that were determined to be hazardous due to the characteristic of corrosivity, as well as the presence of halogenated solvents (F003). Sludge was removed from the impoundment and an aeration basin was constructed over the location of the former impoundment. The was certified closed impoundment November 3, 1987. The existing aeration basin now manages nonhazardous wastewaters at the facility. Because contaminated soils were left in place at the time of the impoundment closure, and because elevated levels of hazardous constituents have been detected in groundwater around the impoundment, postclosure care is required for this unit.

Levels of groundwater contamination caused by releases from the surface impoundment exceed Federal and State Drinking Water Standards. Contaminants found in the groundwater include volatile and semi-volatile organic compounds. A groundwater recovery system was installed in 1990 to remove contaminants from the groundwater and prevent movement of contamination offsite.

The Draft Postclosure Hazardous Waste Permit requires continued operation of the groundwater recovery system, monitoring of groundwater around the former surface impoundment, and Land Use Controls to restrict groundwater use at the facility.

Santolubes is responsible for cleaning up contamination at the facility through a process called corrective action. The corrective action process is described in the draft Hazardous Waste Permit. DHEC oversees all cleanup activities at the facility.

Additional areas at the Santolubes facility requiring corrective action under the draft permit are identified as Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs)

III. Facility's Hazardous Waste Permit History

The United States Environmental Protection Agency (EPA) and DHEC issued a joint Postclosure Hazardous Waste (RCRA) Permit on September 29, 1989 to the Blackman Uhler Chemical Company. On August 10, 1999 DHEC renewed BUCC's permit. RCRA hazardous waste permits issued by DHEC are effective for a ten year period. In February 2009 BUCC submitted an application to renew its postclosure permit. A revised application was submitted to the Department on July 15, 2011, by Santolubes Manufacturing, LLC for the former BUCC facility. The application was approved by DHEC on August 12, 2011.

IV. Draft Permit Requirements

The draft permit contains conditions for the following:

1. Postclosure care of a closed hazardous waste management area.

The closed surface impoundment is considered a hazardous waste management unit. The draft permit includes groundwater monitoring and corrective action for the groundwater contamination around this unit.

2. Identification of solid waste management units (SWMUs) and areas of concern (AOCs) at the facility and proposed corrective action for those units.

Corrective measures are required for sixteen (16) SWMUs and AOCs at the site. Corrective action measures proposed for these units are detailed in the Statement of Basis and the draft permit.

3. Waste minimization, land disposal restrictions and land use control requirements.

V. Public Participation

The Statement of Basis and draft permit is available for public review and comment from August 15, 2011 through September 29, 2011.

DHEC placed a public notice in The *Spartanburg Herald Journal* newspaper on August 15, 2011, announcing the beginning of the public comment period.

Written comments must be submitted no later than September 29, 2011, and should be addressed to Mr. Richard Haynes at the following address:

SC DHEC

Bureau of Land and Waste Management 2600 Bull Street Columbia, SC 29201 Phone: (803) 896-4070

E-Mail: haynesra@dhec.sc.gov

The draft permit, permit application, Statement of Basis and other related information, also known as the Administrative Record, are available for review through **September 29**,

2011, at the DHEC Columbia Office listed above and at the following location

SC DHEC Region 2 EQC Office 900 South Pine Street, Suite 2A Spartanburg, SC 29302

This fact sheet, the public notice, the Statement of Basis and a facility location map may be viewed on DHEC's Website at:

http://www.scdhec.gov/environment/lwm/public_notice.asp

VI. Public Meeting

DHEC is holding an informal public meeting to discuss the draft permit with interested citizens. The meeting is scheduled for Wednesday August 31, 2011, at 6:30 p.m. The meeting will be held at:

E.P. Todd Elementary School 150 Old Canaan Road Spartanburg, SC 29306

Any individuals with disabilities or special needs who wish to participate in the meeting or review the Administrative Record should contact Ms. Norma West at (803) 896-4056 at least one week in advance to discuss any special aids or services needed.

Anyone who would like to be placed on the facility mailing list to receive notification of future public meetings or notices by DHEC's Division of Waste Management should submit a written request to the attention of Ms. Norma West at:

SC DHEC

Bureau of Land and Waste Management 2600 Bull Street Columbia, SC 29201

E-Mail: westnj@dhec.sc.gov

VII. Procedure for Reaching a Final Permit Decision

All written comments received by **September 29, 2011**, will be considered before a final decision is made on the draft permit.

Once DHEC makes its final decision, notification will be provided to:

- The facility;
- Each person who submitted written comments; and
- Anyone who has requested to receive notice of the final decision.

Any affected person who wishes to appeal a DHEC final decision may do so by filing a written request for final review with DHEC's Clerk of the Board within fifteen (15) days after notice of the decision has been mailed.

Additional information regarding appeal procedures is available from DHEC's Clerk of the Board at the above DHEC address or by calling (803) 898-3309.

VIII. Brief Summary of the Draft Hazardous Waste Permit Conditions

The draft hazardous waste permit is divided into seven modules: Each module and a brief explanation of the permit conditions are listed in the table below. The regulation that governs the condition(s) is also listed.

Module I	Standard Conditions	This section defines and contains standard administrative conditions that apply to all hazardous waste management facilities. (R.61-79.270.30)
Module II	General Facility Conditions	Conditions apply to all facilities that treat, store or dispose of hazardous waste. $(R.61-79.264)$
Module III	Postclosure Care	Conditions apply to the general postclosure care requirements of the hazardous waste management units. (R.61-79.264)
Module IV	Groundwater Requirements	Conditions address groundwater contamination from hazardous waste unit(s) at the site and the corrective action that must be conducted (R.61-79.264)

Module V	Corrective Action for Solid Waste Management Units & Areas of Concern	This section requires the facility to implement corrective action measures, when necessary. (R.61-79.264) The objective of the corrective action program at a hazardous waste management facility is to evaluate the nature and extent of releases of hazardous waste and/or constituents and, if necessary, to put corrective measures in place that will protect human health and the environment.
Module VI	Waste Minimization	Conditions require that the facility has a program in place to reduce the volume and toxicity of hazardous waste generated and that the treatment, storage or disposal method minimizes present and future threat to human health and the environment. These conditions are governed by Section 44-56-170(A) of the 1976 South Carolina Code of Laws, as amended.
Module VII	Land Disposal Restrictions	Conditions ensure that restricted waste is not disposed of in a land-based unit or otherwise managed unless certain requirements are met. (R.61-79.268)

Additional information can be found in the draft permit and the facility's permit application.